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January 16, 2024

<p>Sent <i>Via Email</i>: jparsons@midrex.com Jeffrey B. Parsons Midrex Technologies, Inc. 3735 Glen Lake Dr., Suite 400 Charlotte, N.C. 28208</p>	<p><i>Sent Via FedEx</i>: 774834111663 Siemens Corporation Barbara Humpton 300 New Jersey Ave., Suite 1000 Washington, D.C. 20001 <i>and</i>: CT Corporation 1999 Bryan Street, Suite 900 Dallas, Texas 75201</p>
<p><i>Sent Via FedEx</i>: 774834127857 Patrick Schueck Lexicon, Inc. 8900 Fourche Dam Pike Little Rock, AR 72206 <i>and</i>: Dan C. Young 120 East 4th Street Little Rock, AR 72201</p>	<p><i>Sent Via FedEx</i>: 774834142515 Brian Zampell Zampell Refractories, Inc. 9 Stanley Tucker Dr. Newburyport, MA 01950 <i>and</i>: Corporation Service Company d/b/a CSC Lawyers, Inc. Austin, Texas 78701</p>
<p><i>Sent Via Facsimile</i>: 011 44 1904 449888 York Linings Millfield Industrial Estate 2 Millfield Ind Estate Wheldrake, York YO19 6NA United Kingdom</p>	<p><i>Sent via email</i>: antoine.martinez@altrad.com <i>and</i> info@altrad.com <i>and</i> <i>Via Facsimile</i>: 011 44 1904 449888 Antoine Martinez Altrad Group 150 rue Le Perugin 34000 Montpellier France</p>
<p><i>Sent via FedEx</i>: 774834161852 <i>and email</i>: gregory.doerr@primetals.com Gregory Doerr Primetals Technologies USA LLC 5895 Windward Parkway Alpharetta, GA 30005</p>	

RE: DOL: August 14, 2022
Our Insured: Arcelor Mittal USA Holdings Company III
Loss Location: 2800 Kay Bailey Hutchison Road, Portland, TX 78374
Inspection Date: February 15-16, 2024 starting at 9:00 AM CT

NOTICE OF INSPECTION

All:

Please be advised that the destructive testing and laboratory inspection of the subject expansion joint and associated materials is scheduled to take place at **ESI-Dallas, located 10338 Miller Road, Dallas, TX 75238**, starting on **Thursday, February 15, 2024 at 9:00 A.M. C.T. and continuing on the following day**. You are welcome to attend. The inspection protocol is enclosed for your review. To allow us time to provide advance notice to ESI-Dallas, please provide us with the names of everyone who will be attending for your party by Monday, February 12, 2024. Because we expect a large number of attendees from multiple jurisdictions, this inspection date is firm and will not be rescheduled. Please note that pursuant to paragraphs 12-15 of the protocol, there will be additional testing performed on the refractory samples with a date to be determined.

If you believe additional parties should be put on notice of this evidence inspection, please notify us immediately with the name and contact information of any such parties. Additionally, if you are insured for this loss we ask that you notify your carrier. If you have any questions please feel free to call me directly.

Respectfully,

KELLY, SMITH & SCHMIDT, P.C.



Charles T. Kelly

CTK/wzb
Enclosure as stated

ESi Project No. 92885: ArcelorMittal Expansion Joint Failure Destructive Inspection Protocol

Subject: Inspection of Subject Expansion Joint
Date/Time: *February 15 & 16, 2024; 8:30AM CT*
Location: Dallas Accident Storage & Investigation Facility (DASIF)
1361 Ferris Road
Lancaster, Texas 75146

ESi–Dallas
10338 Miller Road
Dallas, Texas 75238

The following presents the destructive inspection protocol of the subject expansion joint associated with the August 14, 2022, incident at the ArcelorMittal/Voestalpine facility in Portland, Texas 78374. Reportedly, the expansion joint failed, and the entire joint was encapsulated in a field-fabricated enclosure that sealed the joint and permitted continued operation.

In November/December 2022, the subject expansion joint was extracted from the bustle line and transferred to the Turner Industries Group facility in Corpus Christi, Texas. In May 2023, the expansion joint was subjected to **Sample Sectioning** as detailed in a previous protocol. In short, the sample sectioning included photographic documentation, dimensional measurements, and removal of the field-fabricated enclosure and portions of the refractory to expose the perforation in the bellow structure. The subject expansion joint was also sectioned to facilitate handling and has since been transferred to DASIF in Lancaster, Texas.

The proposed inspection will start at DASIF, where samples will be selected and sectioned from the expansion joint. The selected samples will then be transferred to the ESi–Dallas facility (about 45 minutes away) for laboratory examination.

The proposed protocol tasks are as follows:

1. Visual examination and photographic documentation of expansion joint
2. Sectioning of expansion joint to extract samples of interest
3. Transport of extracted expansion joint samples to ESi–Dallas
4. Visual and stereoscopic examination of the collected expansion joint samples with photographic documentation
5. If necessary, cleaning of selected samples to facilitate characterization
6. Dimensional measurement of selected features artifacts using hand tools, such as calipers and scales

7. Sectioning of selected samples as needed
8. Scanning electron microscopic (SEM) examination and photographic documentation of selected expansion joint samples
9. If necessary, energy dispersive spectroscopic (EDS) analysis at features of interest on selected expansion joint samples
10. Metallographic preparation and examination with photographic documentation of selected expansion joint cross sections through features of interest
11. Knoop microhardness testing on metallographic cross section(s)
12. Prepare expansion joint samples for quantitative chemical analysis through optical emission spectroscopy (OES) and LECO combustion analysis to be performed at a suitable laboratory
13. If necessary, prepare expansion joint and/or refractory samples for additional property testing to be performed at a suitable laboratory
14. Remove appropriate refractory pieces for determination of physical properties and chemistry at a suitable laboratory. Testing will be carried out following standard ASTM testing.
15. Additional refractory pieces, already removed, will be brought to the testing facility for the same inspection to ensure representation of all areas

All protocol details, such as sectioning locations and methods, cleaning methods, etc., associated with the above tasks will be determined during both phases of the inspection with mutual agreement of all attending parties.

Additional Conditions of Inspection

- The proposed laboratory inspection will conform to the standard specifications related to the examination, preparation, collection, handling, labeling, and storing of artifacts as outlined in ASTM E860, ASTM E1188, ASTM E1459, and ASTM E1492.
- During the course of the proposed examination, it may be necessary to modify the above protocol, and such modifications will only be allowed with mutual consent of all attending parties. All steps in the protocol will only be performed with mutual agreement among all attending parties.
- Completion of the listed protocol tasks is expected to take **two full days**. Additional non-destructive documentation may be performed by ESi–Dallas following the joint inspection, with agreement of all attending parties.
- Videotaping will be permitted without audio unless agreed upon by all attending parties. Personal audio recordings, such as dictation, will be allowed.
- ESi can live broadcast the inspection through ESi Live ([ESi LIVE \(engsys.com\)](https://www.engsys.com)). If you would like to attend this inspection virtually, please provide ESi–Dallas with your email address at least one week prior to the start of the inspection.
- All interested parties, their counsel, and their respective experts are permitted to attend the above-referenced testing. The tests and the results are confidential, and all persons provided

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such information agree that the protocol, tests, and results will not be shared, provided or disclosed with any third party not involved in this matter without the written consent of all parties involved. ESi–Dallas will provide all common data, test results, photographs, video, or any other information or results obtained from the testing per the instructions from counsel.